

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JANE DOE 1000,

*Plaintiff,*

v.

DARREN K. INDYKE and RICHARD D. KAHN  
in their capacities as the executors of the ESTATE  
OF JEFFREY EDWARD EPSTEIN,

*Defendants.*

Case No. 1:19-cv-10577-LJL-DCF

**JOINT STIPULATION AND [PROPOSED] ORDER STAYING ACTION**

WHEREAS independent claims administration experts have designed and are implementing the Epstein Victims' Compensation Program (the "Program") to resolve sexual abuse claims against decedent Jeffrey E. Epstein ("Decedent") in a non-adversarial alternative to litigation; and

WHEREAS Plaintiff Jane Doe 1000 ("Plaintiff," and together with Defendants, Darren K. Indyke and Richard D. Kahn, as Co-Executors of the Estate of Jeffrey E. Epstein, the "Parties"), seeks to participate in the Program; and

WHEREAS the Parties seek to preserve their resources and judicial economy by staying this action for sixty (60) days while Plaintiff participates in the Program; and

WHEREAS should Plaintiff resolve her claims against Decedent via the Program, Plaintiff will promptly discontinue this action with prejudice.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the Parties, that:

1. The captioned action is hereby stayed, both as to discovery and to the resolution of any pending motions, for sixty (60) days from the date of entry of this Order.

2. After the expiration of the stay, if any, the Parties will confer on a schedule for the remaining discovery in this action.

Dated: June 12, 2020  
New York, New York

Respectfully submitted,  
  
BOIES, SCHILLER & FLEXNER LLP

By: /s/ **Sigrid McCawley**  
Sigrid McCawley  
401 E. Las Olas Blvd. Suite 1200  
Fort Lauderdale, FL, 33301  
(954) 377 4223  
smccawley@bsflp.com

*Attorneys for Plaintiff*

TROUTMAN SANDERS LLP

By: /s/ **Bennet J. Moskowitz**  
Bennet J. Moskowitz  
875 Third Avenue  
New York, NY 10022  
(212) 704-6000  
bennet.moskowitz@troutman.com

*Attorneys for Defendants*

Date: \_\_\_\_\_, 2020  
New York, New York

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HON. DEBRA C. FREEMAN  
United States Magistrate Judge